



# SOUTH CAROLINA EMERGENCY MEDICAL SERVICE ASSOCIATION

May 28, 2008

Public Service Commission  
Docketing Department  
101 Executive Center Drive  
Columbia, South Carolina 29210

## DOCKET NUMBER 2007-445-A

Members of the Public Service Commission:

The SCEMA has been active in working with the Office of Regulatory Staff in developing guidelines. There has been open and honest dialogue between several interested groups. The proposed regulation has been dramatically weakened from what was initially discussed.

The South Carolina Emergency Medical Service Association (EMSA) has nine (10) concerns with the proposed regulation regarding Stretcher Vans (26 S.C. Ann. Regs. 1003-133(7). PC&N (Stretcher Vans). The EMSA appreciates that the Public Service Commission and the Office of Regulatory Staff sees the need the establish guidelines to ensure the health and safety to the residents of South Carolina.

### 1. Driver and Assistant Driver Qualifications/Requirements

- a. The only training outlined in the proposed regulation is that the "stretcher van drivers and assistant drivers shall be trained in transferring, loading and unloading passengers in stretchers." These vehicles will be transferring passengers to or from medical appointment, treatment, diagnostic tests and between health care facilities (hospitals and skilled nursing center). The passenger is receiving care, be it at home or in a facility. These passengers have an underlying medical condition that necessitates the need for medical care or treatment not offered at there current location and can only be transported by means of a stretcher. The driver and assistant driver, by this proposed regulation "are not required or authorized to provide medical monitoring, medical aid, medical care or medical treatment of passengers during their transport." Therefore the passenger's welfare may be at risk should their medical condition change.

### 2. Vehicle Requirements

- a. "A stretcher van vehicle must be maintained in good repair and safe operating condition and shall meet the same motor vehicle safety requirements as apply to all motor vehicle in South Carolina. Currently, both wheelchair and stretcher passengers are being transported in vehicle that meet federal standards (wheelchair vehicles must meet ADA standards and ambulances must meet KKK specifications). This regulation would allow for any vehicle, as long as it meets the same motor vehicle safety requirements as apply to all motor vehicle in South Carolina to be utilized without any additional safety requirements that are being met with today's vehicles (wheelchair vehicles meet ADA standards and ambulances meet Federal KKK standards).
- b. Item #7 - "The interior of the stretcher vans shall include secured storage compartments." How are the compartments to be secured to the vehicle with established standards?
- c. Item #8 - "All storage compartments, supplies and equipment shall be kept clean and sanitary." Since the driver and assistant driver are not required or authorized to provide care, what supplies if any will be mandated by policy?
- d. Item #9 - "A stretcher van shall not contain medical equipment or supplies or display any marking, symbols or warning devices that imply that it offers medical care or ambulance transportation." This section states that there is to be no medical equipment or supplies contradicting Item #8.

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**3 Limitations and Conditions of Service**

- a. Item #1.a. "To transport a passenger who requires medical monitoring." In Section A, (Driver and Assistant Driver Qualifications/Requirements, Item #4 states that "The driver assistant shall be seated in the passenger compartment while the vehicle is in motion and shall notify the driver of any sudden change in the passenger's condition." The driver assistant, without any formal training, would be providing medical monitoring of the passenger to notice a change in the passenger's condition.
- b. Item 1.f. and Item 1.g. "To transport a passenger who has sustained an injury and has not yet been evaluated by a physician." A passenger, who resides in a skilled facility, may have a minor injury, which does not require an immediate response. The skilled nursing facility wants the patient transported to the passenger's or the facility's physician. Once the stretcher van arrives and the scope of the transport is above the qualifications of the driver and assistant driver, then the passenger's transport is delayed or cancelled, which would be to the detriment of the passenger's welfare.
- c. Item #1.i. "To transport a passenger who is being evaluated in an emergency room and for any reason must be transported to another hospital for diagnostic test that are not available at the first hospital. Does this apply only to the emergency room, or does it apply to any health care location (inpatient hospitals, outpatient settings to include physician's offices).
- d. Item 2. When the medical condition...of the situation. Appropriate basic first aid shall be initiated and continued until the EMS service has intercepted the transport or arrival at the hospital. This section contradicts The Driver and Assistant Driver Qualifications/Requirements that state ""are not required or authorized to provide medical monitoring, medical aid, medical care or medical treatment of passengers during their transport."

**4. Disaster Evacuation:**

- a. By virtue of federal requirements on evacuation protocol during hurricane storms approaching the Carolina Coast, ambulances are required transport vehicles not stretcher vans. If a large percentage of ambulances are replaced with stretcher vans, the State's ability to evacuate non-ambulatory patients will be compromised and the loss of federal dollars and subsequent fines will assuredly follow. Thinking through these scenarios prior to implementation of any changes should be paramount above and beyond the simple cost saving approach that seems to take precedence over the safety of our citizens.

The South Carolina EMS Association thanks the Public Service Commission for the opportunity to submit comments in reference to the proposed Stretcher Van Regulations.

The South Carolina EMS Association's utmost concern is the safety and welfare of the passengers that may ride in this type of transportation. These passengers have an underlying medical condition(s) that require them to be transported by a stretcher. These passengers may or may not be able to communicate. Without any training or the ability to provide care, the passenger's welfare will be jeopardized.

Respectfully,



Steve Lanford

Executive Director

South Carolina EMS Association